

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

ANNE CHANA HENKIN, *et al.*,

Plaintiffs,

v.

QATAR CHARITY, QATAR NATIONAL BANK
and MASRAF AL RAYAN,

Defendants.

No. 1:21-CV-5716-AMD-VMS

[PROPOSED] PROTECTIVE ORDER

The Court, upon its review of Defendant Qatar Charity’s Motion for Protective Order and the papers submitted in support thereof (the “Motion”) and any response thereto has determined that the discovery sought by Plaintiffs exceeds the scope of the limited jurisdictional discovery authorized by Judge Donnelly’s March 31, 2023, Order (ECF No. 81). The Court therefore determines that good cause exists to grant the Motion’s request for a protective order preventing Plaintiffs from engaging in certain discovery.

Accordingly, on this ____ day of _____, 2023.

It is hereby ORDERED that Qatar Charity’s Motion is GRANTED;

It is hereby ORDERED that jurisdictional discovery is limited to: (i) documents and information concerning transfers of U.S. dollars executed by Masraf al Rayan through a New York correspondent account on behalf of Qatar Charity into any account maintained by Qatar Charity in the Palestinian Territories between October 1, 2012, through September 16, 2018, if any, and (ii) any communications between Masraf al Rayan and Qatar Charity related to the same transactions, with the understanding that the Order entered by Judge Donnelly explicitly limited appropriate discovery to (iii) “document requests and interrogatories sufficient to show”

whether MAR was “acting as Qatar Charity’s agent,” which limitation is embraced within this Order; and

It is hereby ORDERED that Plaintiffs shall not be entitled to additional discovery outside the parameters set forth above and are specifically prevented from seeking the discovery requested in their Requests for Production issued to Qatar Charity numbered 1, 4, and 6–10. (*See* ECF No. 84-1). It is further ORDERED that Plaintiffs are specifically prevented from seeking the discovery requested in the Interrogatory issued to Qatar Charity numbered 2. (*See* ECF No. 84-1).

IT IS SO ORDERED.

Dated: _____, 2023